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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 SUSAN BEAMAN,
19 Individually,
20
21 Plaintiff,

22 vs.

23 BOYD GAMING CORPORATION, a
24 Nevada corporation;
25 DOES 1-10, inclusive; ROE
26 CORPORATIONS 1-10, inclusive,
27 Defendant.

Case No: 2:15-cv-02393-APG-VCF

28 **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER**

Plaintiff, SUSAN BEAMAN, by and through her undersigned counsel, KIRK T. KENNEDY, ESQ., and the Defendant, BOYD GAMING CORPORATION, INC., by and through its undersigned counsel, SCOTT M. ABBOTT, ESQ. and KAITLIN H. ZIEGLER, ESQ. of the firm of Kamer Zucker Abbott, hereby submit this Stipulated Discovery Plan and Scheduling Order. The parties conducted a Rule 26(f) conference on January 27, 2016.

DESCRIPTION OF ACTION: This case asserts claims under the Age Discrimination in Employment Act and the Americans with Disabilities Act. Defendant denies all claims for relief.

Proposed Discovery Schedule:

1. Estimated time required for discovery: Discovery will take 180 days from the filing of the Defendant's first appearance in the matter on January 22, 2016. The discovery deadline shall be July 20, 2016.
2. Amendment of Pleadings and Addition of Parties: Unless otherwise ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not be later than 90 days prior to the discovery cut-off date, which in this matter is not later than April 21, 2016.
3. The disclosure of experts and expert reports shall occur on or before May 20, 2016, which is 60 days before the discovery cut-off date; and the disclosure of rebuttal experts and their reports shall occur on or before June 20, 2016, which is 30 days after the expert disclosure deadline.
4. Interim Status Report: On or before May 20, 2016, the parties shall file an interim status report as required by LR 26-3, stating the time required for trial, three alternative dates of trial, and whether or not trial will be proceeding or affected by substantive motions.
5. The parties shall have until August 19, 2016, to file dispositive motions. This is 30 days after the discovery cut-off date and does not exceed the outside limit of thirty (30) days following the discovery cut-off date that LR 26-1(e)(4) presumptively sets for filing dispositive motions.
6. The pretrial order shall be filed by September 19, 2016, which is not more than thirty (30) days after the date set for filing dispositive motions in the case. This deadline is suspended if dispositive motions are timely filed and, in such case, the deadline for filing the pretrial order shall be thirty (30) days after decision on said dispositive motions, or by further order of the court. The disclosures required by FRCP Rule 26 (a)(3) shall be made in the joint pretrial order.
7. Stipulations regarding limitations or conditions or additional discovery:
 - a. Parties shall engage in all permissible discovery as allowed under the FRCP and local

rules.

8. Extensions of Modifications of the Discovery Plan and Scheduling Order:
Applications or motions to extend the discovery plan dates shall comply with the requirements of LR 6-1 and LR 26-4 and shall be filed 21 days prior to the particular deadline sought to be extended. The motion or stipulation shall include:

- a. A statement specifying the discovery completed to date;
- b. A specific description of the discovery which remains to be completed;
- c. The reasons why remaining discovery was not completed within the time limits of the existing discovery deadline; and
- d. A proposed schedule for the completion of remaining discovery.

9. Settlement: The undersigned attorneys affirm that they have discussed possible settlement of this action as well as the use of extrajudicial procedures or alternative methods of dispute resolution to resolve this case.

/s/Kirk T. Kennedy
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Dated: 1/28/16

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Dated: 1/28/16

ORDER

IT IS SO ORDERED.

Dated this 29th day of January, 2016.



UNITED STATES MAGISTRATE JUDGE